

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Cause No. 4:21-cr-00539-RWS-JMB
)
MICHAEL J. MCCORMAC,)
)
Defendant.)

**FINAL MOTION FOR ADDITIONAL TIME TO REVIEW DISCOVERY
MATERIALS AND DETERMINE WHETHER, AND/OR WHICH,
PRETRIAL MOTIONS ARE TO BE FILED**

COMES NOW defendant Michael J. McCormac, by and through undersigned counsel, and hereby respectfully requests from this Honorable Court an additional twenty days to review discovery and determine whether, and/or which, pretrial motions ought to be filed on behalf of defendant. In support thereof, defendant states as follows:

1. Defendant was arraigned on the Indictment in the above-referenced matter on October 18, 2021.
2. Counsel for defendant entered his appearance for defendant on November 29, 2021.
3. Counsel for defendant received discovery in this matter on December 2, 2022.
4. The discovery is quite voluminous, including approximately 41,000 pages of reports, interviews, and documents seized during the search warrant in this case. In addition, the discovery contains approximately 10,000 recorded telephone calls, of which approximately 5,000 are of some substance to the charges set forth in the Indictment.

5. Counsel for defendant has personally met with the Government, as well as had numerous other discussions, regarding the voluminous discovery referenced above. As a result, counsel for defendant must continue reviewing with defendant the voluminous discovery referenced above in order to allow time for the defendant to consider his options. Defendant and the Government are in negotiations attempting to resolve this matter without a trial. The additional twenty day extension will be defendant's deadline to decide.

6. Further, to deny defendant's request for such additional time would deny counsel for defendant the reasonable time necessary to effectively investigate and prepare pretrial motions, taking into account the exercise of due diligence. Therefore, the ends of justice are served by granting defendant's request.

7. Assistant United States Attorney Meredith Reiter has no objection to defendant's *final* request for additional time to review discovery and determine whether, and/or which, pretrial motions ought to be filed on behalf of defendant, and continued plea negotiations.

WHEREFORE, defendant Michael J. McCormac, by and through counsel, respectfully requests this Court grant a twenty-day extension of the deadline until and including July 13, 2022, to file any pretrial motions or a waiver thereof.

Dated: June 22, 2022.

Respectfully submitted,

/s/ John T Davis

John T Davis, #40915MO
1401 South Brentwood Boulevard, Suite 950
St. Louis, Missouri 63144
Phone: (314) 863-6363
Fax: (314) 727-2869
E-Mail: John.Davis@KesslerWilliams.com

Attorney for Defendant Michael J. McCormac

CERTIFICATE OF SERVICE

I hereby certify on the 22nd day of June 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney.

/s/ John T Davis

John T Davis